

<u>Name of Plaintiff</u>	<u>Name of Defendant</u>	<u>Kind of Suit</u>
Bala Jain, LLC 6007 Marilyn Drive Alexandria, Virginia 22310	EAGLE PROPERTIES AND INVESTMENTS LLC 445 Windover Avenue Vienna, Virginia 22180 Serve: J. Chapman Petersen, Esq. Chap Petersen & Associates, PLC 3970 Chain Bridge Road Fairfax, Virginia 22030 <i>Counsel for Eagle Properties and Investments, LLC, Monika Jain and Amit Jain</i>	The lawsuit alleges that one or more of the Defendants used money it borrowed from Bala Jain, LLC to acquire, improve, and/or develop the subject Property. The lawsuit alleges that the Defendants engaged

	MONIKA JAIN 445 Windover Avenue Vienna, VA 22180 Serve: J. Chapman Petersen, Esq. Chap Petersen & Associates, PLC 3970 Chain Bridge Road Fairfax, Virginia 22030 <i>Counsel for Eagle Properties and Investments, LLC, Monika Jain and Amit Jain</i>	in fraud, conspiracy to commit fraud, breach of contract, and seeks a declaratory judgment and injunctive relief establishing a constructive trust against this Property and such other relief as may be necessary to protect and prepare Bala Jain, LLC's interest in the Property.
	AMIT JAIN 445 Windover Avenue Vienna, VA 22180 Serve: J. Chapman Petersen, Esq. Chap Petersen & Associates, PLC 3970 Chain Bridge Road Fairfax, Virginia 22030 <i>Counsel for Eagle Properties and Investments, LLC, Monika Jain and Amit Jain</i>	
	FIRST CLASS TITLE, INC. 1803 Research Blvd, Suite 512 Rockville, Maryland 20850 Serve: Jessica Summers, Esq. The Law Firm of Paley Rothman 4800 Hampden Lane, 6 th Floor Bethesda, MD 20814 jsummers@paleyrothman.com <i>Counsel for First Class Title, Inc. and Daniel Kotz, Esq.</i>	
	Daniel Kotz, Esq. 1803 Research Blvd #512 Rockville, MD 20850 Serve: Jessica Summers, Esq. The Law Firm of Paley Rothman 4800 Hampden Lane, 6 th Floor Bethesda, MD 20814 jsummers@paleyrothman.com <i>Counsel for First Class Title, Inc. and Daniel Kotz, Esq.</i>	
	ARPAAGRO GENERAL TRADING, LLC 2567 Chain Bridge Rd Unit 2E Vienna, VA 22182	
	EAGLE PROPERTIES, LLC 445 Windover Ave. Vienna, VA 22180	
	EAGLE INVESTMENTS, LLC 445 Windover Ave. Vienna, VA 22180	
	TRUE PROPERTIES, LLC 2567 Chain Bridge Road, Unite 2E Vienna, Virginia 22182	

	TRUE PROPERTIES, LL 2567 Chain Bridge Road, Unite 2E Vienna, Virginia 22182,	
	Sell USA LLC 445 Windover Ave. Vienna, VA 22180	
	495 REAL ESTATE, LLC 2567 Chain Bridge Road, Unite 2E Vienna, Virginia 22182 2567 Chain Bridge Road, Unite 2E Vienna, Virginia 22182,	
	SHEHLA JARRAL 514 Bond Avenue Reisterstown, Maryland 21136	
	MUHAMMAD JARRAL 514 Bond Avenue Reisterstown, Maryland 21136	
	SPSVA, LLC c/O: Satpal Singh, registered agent 10313 Henderson Road Fairfax Station, Virginia 22039	
	DOLBI USA, LLC c/o: Shaikh R. Rahim, Managing Member 13306 Smoketown Road Woodbridge, Virginia 22192	
	SHAIKH M. RAHIM 145 W Ostend Street, Suite 600 Baltimore, Maryland 21230	
	MOHEED RAHIM 145 W Ostend Street, Suite 600 Baltimore, Maryland 21230	
	JACQUELINE ALEXANDER 1009 Sweetgrass Circle La Plata, Maryland 20646	
	CAPITAL ONE, NATIONAL ASSOCIATION 1680 Capital One Dr. Mc Lean, VA, 22102	
	FULTON FINANCIAL CORPORATION 1 Penn Sq, PO Box 4887 Lancaster, PA, 17602	
	MAIN STREET BANK c/o: Kagan, Stern, Marinello and Beard, PLLC, registered agent 10089 Fairfax Boulevard Fairfax, Virginia 22030	
	BANK OF CLARKE COUNTY c/o: Kathleen J. Chappell, registered agent 2 East Main Street Berryville, Virginia 22611	
	NAVY FEDERAL FINANCIAL GROUP, LLC 1007 Electric Ave, Vienna, VA, 22180	

	SAPTAL SINGH, 10313 Henderson Road Fairfax Station, Virginia 22039	
	ATLANTIC UNION BANK f./k/a UNION BANK & TRUST c/o: RACHAEL LAPE, registered agent Union Bankshares Corporation 1051 E. Cary Street, Suite 1200 Richmond, Virginia, 23219	
	PNC BANK, N.A. 249 Fifth Avenue Pittsburgh, Pennsylvania 15222	
	PRIMIS BANK D/B/A/ SONA BANK 10900 Nuckols Road, Suite 325 Glen Allen, Virginia 23060	

Please index this action filed in the Virginia state courts as a *lis pendens* against the property located at 6961 Sterling Rd, Harrisburg, PA 17112. Parcel ID 68-045-029 UPI: 68-045-029-000-0000, more particularly described as:

ALL THAT CERTAIN PIECE OR PARCEL OF GROUND, TOGETHER WITH ALL BUILDINGS AND IMPROVEMENTS THEREON ERECTED, SITUATE IN THE TOWNSHIP OF WEST HANOVER, DAUPHIN COUNTY, COMMONWEALTH OF PENNSYLVANIA, AS MORE FULLY DESCRIBED IN THE DEED RECORDED IN DAUPHIN COUNTY RECORD BOOK 2901, PAGE 526, AND BEING KNOWN AND DESIGNATED AS LOT 73 (ERRONEOUSLY STATED IN TWO PRIOR INSTRUMENTS (RECORDED 9-2-2009, AS INSTRUMENT NO. 20090029925, AND RECORDED 11-16-2004, IN BOOK 5764, PAGE 229) AS "LOT 72"), FINAL SUBDIVISION PLAN – PHASE I WESTFORD CROSSING RECORDED ON NOVEMBER 7, 1979 IN DAUPHIN COUNTY PLAN BOOK G, VOL. 3, PAGE 96. CONTAINING 8.477 SQUARE FEET ACCORDING TO THE AFORESAID SUBDIVISION PLAN.

SAID PROPERTY BEING KNOWN FOR PURPOSES OF ASSESSMENT AND TAXATION PURPOSES AS PROPERTY IDENTIFICATION NO. 68-045-029, UPI 68-045-029-000-0000.

DAUPHIN COUNTY, PENNSYLVANIA.

I certify that this action involves title to real estate and seeks relief in the form of imposition of a constructive trust based on Eagle Properties and Investments, LLC's ("Eagle") use of loan proceeds it obtained from Bala Jain, LLC for the purchase, improvement and development of the real estate at issue. Bala Jain, LLC has filed a lawsuit against Eagle, Amit Jain, Monika Jain, First Class Title, and Daniel Kotz. The lawsuit alleges, *inter alia*, that: Amit Jain, Monika Jain, First Class title and Daniel Kotz committed fraud and conspiracy to commit fraud in order to deceive Bala Jain, LLC to lend Eagle \$7.5 million in loans to purchase, improve, and develop various real properties, including the real estate at issue (Counts I and II), and that Bala Jain is entitled to declaratory judgment that Eagle's failure to repay the loans combined with the other defendants to fraud entitles Bala Jain to seek imposition of a constructive trust on the real estate at issue (Count III).

Plaintiff is seeking a Constructive Trust on the property referenced herein.

Dated: December 12, 2022

Respectfully submitted,



Alan V. Klein, Esq.
alan.klein@offitkurman.com
Attorney for Plaintiff
OFFIT KURMAN, P.A.
401 PLYMOUTH ROAD, SUITE 100
PLYMOUTH MEETING, PENNSYLVANIA
19462
(267) 338-1300

VERIFICATION

I, SHAIL BUTANI, verify that I am Managing Member of Bala Jain, LLC, a Virginia LLC, and I am authorized to make this verification on its behalf. The allegations in the foregoing praecipe to index an action as *lis pendens* are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

Bala Jain, LLC, a Virginia LLC,

By: Shail Butani

SHAIL BUTANI

Its: Managing Member

Alan V. Klein, Esq.
alan.klein@offitkurman.com
Attorney I.D. No. 57104
OFFIT KURMAN, P.A.
401 PLYMOUTH ROAD, SUITE 100
PLYMOUTH MEETING, PENNSYLVANIA 19462
(267) 338-1300

IN THE COURT OF COMMON PLEAS OF
DAUPHIN COUNTY, PENNSYLVANIA
12th JUDICIAL DISTRICT

Court Term: JULY, 2022

BALA JAIN, LLC,

Plaintiff[s],

v.

**EAGLE PROPERTIES AND
INVESTMENTS LLC, ET AL.,**

Defendant[s].

IN THE CIRCUIT COURT
OF FAIRFAX COUNTY VIRGINIA
No. [CL-2022-0009687]

**CERTIFICATION OF COMPLIANCE WITH
CASE RECORDS PUBLIC ACCESS POLICY**

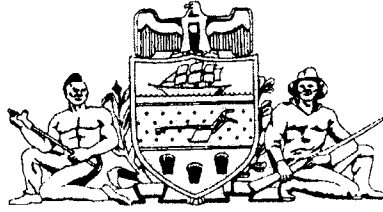
I certify that this filing, which includes a Praecipe to Index as Lis Pendens, complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

12/12/2022


Alan V. Klein

James M. Zugay, Esq.
Recorder of Deeds
(717) 780-6560

Candace E. Meck
First Deputy



Location:
Dauphin County Courthouse
Room 102
Front & Market Streets
Harrisburg, PA 17101

Recorder of Deeds

Harrisburg, Pennsylvania

CERTIFIED END PAGE

INSTRUMENT #: 20220035870
RECORD DATE: 12/14/2022 9:08:43 AM
RECORDED BY: CMECK
DOC TYPE: LIS PEND
AGENT: SIMPLIFILE
DIRECT NAME: BALA JAIN, LLC
INDIRECT NAME: EAGLE PROPERTIES & INVESTMENTS LLC

RECORDING FEES - State: \$0.50
RECORDING FEES - County: \$13.00
ACT 8 OF 1998: \$5.00
ADDITIONAL NAME FEE: \$6.00
TOTAL NAMES: \$10.50

UPICount: 1
UPIFee: 20
UPIList: 68-045-029-000-0000

I Certify This Document To Be Recorded
In Dauphin County, Pennsylvania.



James M. Zugay, Recorder of Deeds

THIS IS A CERTIFICATION PAGE

PLEASE DO NOT DETACH

THIS PAGE IS NOW PART OF THIS LEGAL DOCUMENT